

EXHIBIT J

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

JAKOB STEDMAN and RACHEL STEDMAN,
as husband and wife and as co-guardians of
C.B.S., a minor,

Plaintiffs,

v.

SEATTLE CHILDREN'S HOSPITAL, a
nonprofit Washington corporation,

Defendant.

NO.

SUMMONS
(TWENTY DAY)

TO: DEFENDANTS

A lawsuit has been started against you in the above-entitled court by the plaintiff herein. Plaintiff's claims are stated in the written Complaint for Damages, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and serve a copy upon the person signing this Summons within twenty (20) days after the service of this Summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where the plaintiff is entitled to what he and she asks for because you have not responded. If you serve a Notice of Appearance

SUMMONS (TWENTY DAY) – 1

LAW OFFICES OF JAMES S. ROGERS
1500 Fourth Avenue, Suite 500
Seattle WA 98101
Phone: 206/621-8525; Fax: 206/223-8224

1 on the undersigned person, you are entitled to notice before a default judgment may be entered.

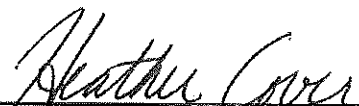
2 You may demand that the plaintiff file this lawsuit with the court. If you do so, the demand
3 must be in writing and must be served upon the person signing this summons. Within 14 days
4 after you serve the demand, the plaintiff must file this lawsuit with the court, or the service upon
5 you of this Summons and Complaint for Damages will be void.

6 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
7 that your written response, if any, may be served in time.

8 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
9 of Washington.

10
11 DATED this 2nd day of December, 2019.

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13 LAW OFFICES OF JAMES S. ROGERS

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16 James S. Rogers, WSBA No. 5335
17 Heather M. Cover, WSBA No. 52146
18 Michelle Hyer, WSBA No. 32724
19 Attorneys for Plaintiff
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COMPLAINT FOR DAMAGES

Come now Plaintiffs, by counsel, and for the cause of action against Defendant allege as follows:

I. INTRODUCTION AND PARTIES

1. This case involves exposure of Plaintiff C.B.S. to toxic aspergillus mold while undergoing brain surgery in Defendant's operating facilities. As a direct and proximate result of Defendant's negligent practice and failure to adhere to applicable standard of medical care in the State of Washington, C.B.S. was not only exposed to this mold, but needed to undergo an otherwise unnecessary additional brain surgery with not only concomitant risks, but also

COMPLAINT FOR DAMAGES – 1

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1 located in King County and the negligence alleged herein occurred in King County.

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3 **III. FACTS RELATING TO CLAIMS**

4 11. Plaintiff C.B.S. was born on May 7, 2015.

5 11. C.B.S. was diagnosed with an exophytic brainstem mass May 17, 2019.

6 C.B.S. was admitted to SCH for surgery on May 17, 2019 for a craniotomy and C1 laminectomy for
7 removal of the brainstem mass.

8 12. The May 17, 2019 surgery resulted in partial removal of the brainstem mass, with
9 placement of a synthetic duraplasty graft in the brainstem area.

10 13. Postoperatively, C.B.S. did very well. He was eating well and was able to get out of
11 bed. C.B.S. was ready for discharge from SCH on May 21, 2019.

12 14. On the day C.B.S. was to be discharged, he was identified by SCH as being at high
13 risk for Aspergillus mold exposure during his surgery.

14 15. C.B.S. was immediately started on prophylactic medications for Aspergillus
15 exposure.

16 16. C.B.S. was transferred to Harborview Medical Center on May 21, 2019, for removal
17 of the synthetic duraplasty graft due to possible Aspergillus contamination. C.B.S.'s physicians
18 determined that the removal of the potentially contaminated patch would be necessary.

19 17. The second surgery, another open craniotomy, occurred on May 24, 2019.

20 18. But for Defendant's negligence in failing to provide a sterile operating care, this
21 second brain surgery never would have been undertaken.

1 DATED this 2nd date of December, 2019.

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4 LAW OFFICES OF JAMES S. ROGERS

5
6 s/James S. Rogers

7 s/ Heather M. Cover

8 s/Michelle Hyer

9 James S. Rogers, WSBA #5335

10 Heather M. Cover, WSBA #52146

11 Michelle Hyer, WSBA #32724

12 Attorneys for Plaintiff
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COMPLAINT FOR DAMAGES – 7

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